

1 DAVID R. ZARO (BAR NO. 124334)
TED FATES (BAR NO. 227809)
2 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
3 515 South Figueroa Street, Ninth Floor
Los Angeles, California 90071-3309
4 Phone: (213) 622-5555
Fax: (213) 620-8816
5 E-Mail: dzaro@allenmatkins.com
tfates@allenmatkins.com

6 Attorneys for Receiver
7 THOMAS A. SEAMAN

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DISTRICT**

12 SECURITIES AND EXCHANGE
COMMISSION,

13 Plaintiff,

14 vs.

15 SMALL BUSINESS CAPITAL CORP.;
16 MARK FEATHERS; INVESTORS PRIME
FUND, LLC; and SBC PORTFOLIO
17 FUND, LLC,

18 Defendants.

Case No. CV12-03237

**RECEIVER'S ADMINISTRATIVE
MOTION FOR PAYMENT OF LOAN
SERVICING COSTS FOR
SEPTEMBER 2014**

Ctrm: 4 - 5th Floor
Judge: Hon. Edward J. Davila

1 Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver for Small
 2 Business Capital Corp. ("SB Capital"), Investors Prime Fund, LLC ("IPF"), SBC Portfolio
 3 Fund, LLC ("SPF"), and their subsidiaries and affiliates (collectively, "Receivership Entities"),
 4 hereby submits this Application for Payment of Loan Servicing Costs for September 2014. In its
 5 order entered on August 7, 2014, the Court authorized the Receiver to submit monthly bills for
 6 loan servicing costs, starting with August 2014. Docket No. 936.

7 The total cost of servicing the loan portfolios for September 2014 was \$17,059.50. A
 8 complete list of each task performed is attached as Exhibit A. During September, the Receiver's
 9 previous efforts to stabilize the borrower base resulted in additional cost savings as most
 10 borrowers are now in compliance with their loan commitments. Specifically, most property tax
 11 defaults have now been cured and enforcement of late fees has improved collections. Moreover,
 12 no new defaults occurred and therefore no borrower site visits were required in September.
 13 Additional savings arose by delegating certain servicing tasks to lower priced personnel.

14 Based on the foregoing, the Receiver respectfully requests Court approval and authority to
 15 pay the September 2014 loan servicing costs of \$17,059.50.

16
 17 Dated: October 21, 2014

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

19 By: /s/ Ted Fates

20 TED FATES
 Attorneys for Receiver
 Thomas A. Seaman

EXHIBIT A

Thomas Seaman Company
 3 Park Plaza
 Suite 550
 Irvine, CA 92614

Invoice submitted to:
 Thomas Seaman, Receiver for SBC
 3 Park Plaza
 Suite 550
 Irvine, CA 92614

October 21, 2014

Invoice #11172

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Loan Servicing</u>		
9/9/2014 DC	Loan Servicing Performed manual backup of SB Capital Mortgage Backoffice. Reviewed and verified backup logs.	0.20 125.00/hr	25.00
9/2/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	3.00 135.00/hr	405.00
9/3/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	1.30 135.00/hr	175.50
9/4/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	1.50 135.00/hr	202.50
9/5/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.50 135.00/hr	337.50
9/8/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on	2.50 135.00/hr	337.50

Thomas Seaman, Receiver for SBC

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
	pending matters, entered deposits.		
9/9/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	3.50 135.00/hr	472.50
9/10/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.00 135.00/hr	270.00
9/11/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Did loan payoff letter for One World Inn/ Amber House.	3.00 135.00/hr	405.00
9/12/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Did Colson prepayment notice letter and sent for One World Inn/Amber House.	2.70 135.00/hr	364.50
9/15/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	1.50 135.00/hr	202.50
9/16/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Drafted and sent letter to investor explaining final K-1's for 2012, and establishment of the QSF.	2.50 135.00/hr	337.50
9/17/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Ran reports for 504 loan payments received and posted in ABS.	3.00 135.00/hr	405.00
9/18/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	1.50 135.00/hr	202.50
9/19/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on	2.00 135.00/hr	270.00

Thomas Seaman, Receiver for SBC

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
	pending matters, entered deposits.		
9/23/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.00 135.00/hr	270.00
9/24/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	3.00 135.00/hr	405.00
9/25/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.50 135.00/hr	337.50
9/26/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Sent out requests for updated personal financial statements and 2013 tax returns to CBB borrowers. Rolled forward tracking spreadsheet.	3.50 135.00/hr	472.50
9/29/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Did payoff letter and Colson prepayment letter for Nina Sanai/Devon Dental. Discussed 21 day prepaid/notice to SBA when paying off.	2.70 135.00/hr	364.50
9/30/2014 KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Closing books in ABS, cleared out registers, reconciled 1502 report to balances per ABS, etc.	2.50 135.00/hr	337.50
9/2/2014 MRF	Loan Servicing Deposited multiple borrower payments received for September and performed accompanying accounting entries to Quickbooks.	2.10 60.00/hr	126.00
9/3/2014 MRF	Loan Servicing Performed property tax payment checks via county websites for out of state borrowers with recent payment due dates and updated tracking spreadsheet.	1.20 60.00/hr	72.00
MRF	Loan Servicing Performed accounting and servicing report revisions for August 2014.	3.40 60.00/hr	204.00

Thomas Seaman, Receiver for SBC

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
9/3/2014	MRF Loan Servicing Made accounting entries for borrower ACH payments received. Called borrower re missing endorsement on September payment received.	0.30 60.00/hr	18.00
9/4/2014	MRF Loan Servicing Received borrower payments for September, deposited checks, and made accompanying accounting entries for same.	1.20 60.00/hr	72.00
9/5/2014	MRF Loan Servicing Deposited borrower payments received for September and made accompanying accounting entries to Quickbooks.	0.80 60.00/hr	48.00
9/8/2014	MRF Loan Servicing Exchanged emails with borrower re unsigned check received as September's payment.	0.20 60.00/hr	12.00
	MRF Loan Servicing Received borrower payments for September, deposited, and made accompanying accounting entries to Quickbooks.	1.30 60.00/hr	78.00
9/9/2014	MRF Loan Servicing Followed up with Rafael re servicing issues cured and still outstanding. Decided action to take re Bragato property taxes.	0.60 60.00/hr	36.00
	MRF Loan Servicing Prepared/revised servicing financial reports and accounting for upcoming report.	3.20 60.00/hr	192.00
	MRF Loan Servicing Received borrower payments for September, deposited, and made accompanying accounting entries to Quickbooks.	1.10 60.00/hr	66.00
9/10/2014	MRF Loan Servicing Deposited borrower payments received and made accompanying accounting entries to Quickbooks.	0.70 60.00/hr	42.00
	MRF Loan Servicing Received inquiry form borrower re 2013 payment statement. Pulled statement and sent to borrower.	0.30 60.00/hr	18.00
9/11/2014	MRF Loan Servicing Met with Rafael re current servicing issues, (delinquent property taxes, missing insurance coverage verifications, and stale financial statements). Discussed remedies to pursue, additional action available, and borrower cooperation re same.	0.60 60.00/hr	36.00
	MRF Loan Servicing Exchanged phone calls/emails with multiple borrowers re financial statements requested for annual servicing. Filed/forwarded financial	1.00 60.00/hr	60.00

Thomas Seaman, Receiver for SBC

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
	statements received and updated tracking re same.		
9/12/2014	MRF Loan Servicing Deposited borrower payments received for September and made accompanying accounting entries to Quickbooks.	0.60 60.00/hr	36.00
9/16/2014	MRF Loan Servicing Contacted multiple borrowers re insurance verifications and financial statements owed per their loan agreements. Filed items received and updated tracking re same.	0.90 60.00/hr	54.00
9/17/2014	MRF Loan Servicing Received request from legal re 3AM foreclosure. Spoke with Rafael re items asked for by legal and action to take. Forwarded invoice received from auctioneer and gave instructions for payment re same.	0.60 60.00/hr	36.00
9/18/2014	MRF Loan Servicing Discussed with Rafael items received re 3AM bankruptcy, how to apply payment, and response to legal. Gave instructions to Kristen Janulewicz re same.	0.30 60.00/hr	18.00
	MRF Loan Servicing Responded and follow-up correspondence with borrowers re property tax payments, and required financial statements. Updated tracking for those received of same.	0.50 60.00/hr	30.00
	MRF Loan Servicing Deposited payments received from 504 FMLP loans and made accompanying accounting entries to Quickbooks.	1.10 60.00/hr	66.00
9/23/2014	MRF Loan Servicing Deposited checks and ACH payments received from borrowers for October. Performed accompanying accounting entries to Quickbooks.	0.60 60.00/hr	36.00
9/24/2014	MRF Loan Servicing Deposited October payments received from loan borrowers and made accompanying accounting entries to Quickbooks. Spoke with borrower re missing payment for September.	0.70 60.00/hr	42.00
9/25/2014	MRF Loan Servicing Follow up calls/email with multiple borrowers re financial statements received and additional statements required. Filed those received and updated tracking spreadsheet re same. Additional follow-up re late fees and payments re same.	2.30 60.00/hr	138.00
	MRF Loan Servicing Spoke with borrower re notice received from CA Business Bank. Spoke with Kristen Janulewicz re same and acquisition of recent	0.60 60.00/hr	36.00

Thomas Seaman, Receiver for SBC

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
	financial statements from borrowers that CBB has an interest in.		
9/29/2014	MRF Loan Servicing Received message from Devon Dental re loan payoff statement. Spoke with additional borrower re missing statement for October 1st payment date.	0.40 60.00/hr	24.00
	MRF Loan Servicing Received borrower payments for October 1st payment date. Deposited and performed accompanying accounting entries.	1.00 60.00/hr	60.00
9/30/2014	MRF Loan Servicing Received multiple borrower payments for October 1st pay date, deposited, and performed accompanying accounting entries.	0.90 60.00/hr	54.00
	MRF Loan Servicing Received call from TB Insurance re October payment statement and ACH setup. Forwarded statement and ACH authorization to borrower. Received follow-up call from Devon Dental re loan payoff statement and gave instructions re same.	0.80 60.00/hr	48.00
	MRF Loan Servicing Received financial statements requested from borrower and responded to clarify remaining statements needed. Printed and filed financial statements received.	0.40 60.00/hr	24.00
9/2/2014	RVG Loan Servicing Telephone conference with legal counsel (C. Hopkins) & M. Williams (Receiver) & discussed at length re: 3 AM LLC's Foreclosure Sale & Ex Parte Motion Order Appointing Receiver; Spoke & discussed with Shema Sherwin (borrower) at length re; Assisted Medical Transport's Refinance & Loan Payoff; Followed up phone call from Kevin Pham (borrower) & discussed re: Personal Property Insurance Coverage & acknowledge receipt of Insurance Binder.	1.30 195.00/hr	253.50
9/3/2014	RVG Loan Servicing Reviewed & concurred with legal counsel (C. Hopkin) re; Consent Order Approving Interim Use of Cash Collateral & Appointment of Receiver; Responded to Shema Sherwin (Borrower) email re: Payoff amount for Assisted Medical Transport's Refinance of Real Property collateral.	1.40 195.00/hr	273.00
9/4/2014	RVG Loan Servicing 6.4 hours travel to Baltimore, Maryland to attend 3 AM LLC's Trustee's Sale w/ Legal Counsel to attend meetings with Borrowers/legal counsels, Foreclosure Bidders, Note Purchasers, SBA, Flag, Mgmt/Receiver & Hotel Brokers re: 3 AM LLC; Conduct the mandatory site visit inspections, pursuant to the SBA SOP 50 51 2(A)/50 57 re: 3 AM LLC. (Half Pay Travel Time).	6.40 195.00/hr	1,248.00

Thomas Seaman, Receiver for SBC

Page 7

		<u>Hrs/Rate</u>	<u>Amount</u>
9/4/2014	RVG Loan Servicing Reviewed & conferred with legal counsel (C. Hopkins) re: 3 AM LLC's Order to Appoint Receiver; Reviewed & discussed with legal counsel (C. Hopkin) at length re: 3 AM LLC's 2nd Bankruptcy Filing; Notified the SBA re: 3 AM LLC's Foreclosure Sale Postponement & Borrowers' 2nd Bankruptcy Filing.	1.60 195.00/hr	312.00
9/5/2014	RVG Loan Servicing Attended foreclosure sale with legal counsel (C. Hopkins) re: 3 AM LLC's foreclosure sale postponement; Discussed & conferred with legal counsel (C. Hopkin) at length re: 3 AM LLC's Emergency Motion to Dismiss Borrower's Chapter 11 Bankruptcy & use of Cash Collateral. Notified & emailed S. Park of SBA Arkansas copied Thomas Seaman re: 3 AM LLC's foreclosure sale postponement & bankruptcy filing.	6.30 195.00/hr	1,228.50
	RVG Loan Servicing 6.7 hours travel from Baltimore, Maryland to OC Airport to attend 3 AM LLC's Trustee's Sale w/ Legal Counsel, Meetings with Borrowers/legal counsels, Foreclosure Bidders, Note Purchasers, SBA, Flag, Magn't/Receiver & Hotel Brokers re: 3 AM LLC; Conduct the mandatory site visit inspections, pursuant to the SBA SOP 50 51 2(A)/50 57 re: 3 AM LLC. (Half Pay Travel Time).	6.70 195.00/hr	1,306.50
9/8/2014	RVG Loan Servicing Reviewed draft copy, discussed & conferred with legal counsel (C. Hopkin) at length re: 3 AM Cash Collateral Stipulation Order; Telephone conference with C. Hopkin (esquire)/R. Gilman (borrower's atty) re: 3 AM LLC's Cash Collateral Stipulation Agreement.	1.90 195.00/hr	370.50
9/9/2014	RVG Loan Servicing Reviewed, analyzed & discussed with legal counsel (C. Hopkin) at length re: 3 AM LLC's Disclosure Statements (F/S, Loan Approval LOC, Business Plan, etc.) & draft copy of Motion for Use of Cash Collateral; Followed up phone call from G. Patel (borrower) & discussed at length re: Sunshine Hospitality Pre-Payment Penalty Waiver.	2.60 195.00/hr	507.00
9/10/2014	RVG Loan Servicing Reviewed & discussed with legal counsel (C. Hopkin) at length re: 3 AM LLC's Redlined Interim Consent Order Approving Interim Agreement For Use of Cash Collateral & Motion to Dismiss Bankruptcy.	0.90 195.00/hr	175.50
9/11/2014	RVG Loan Servicing Conferred & discussed with legal counsel (C. Hopkin) at length (2 times) re: 3 AM LLC's Redlined Interim Consent Order Approving Interim Agreement For Use of Cash Collateral & Motion to Dismiss Bankruptcy.	1.30 195.00/hr	253.50

Thomas Seaman, Receiver for SBC

Page 8

		<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2014	RVG Loan Servicing Met with Matthew F. & discussed re: SBC's Loan Portfolio's Servicing Issues (Monetary/Technical Defaults).	0.60 195.00/hr	117.00
9/12/2014	RVG Loan Servicing Telephone conference with legal counsel (C. Hopkin) & borrower's counsel (R. Gilman) & discussed at length re: Adequate Payment Protection (Regular P&I Payment), Disclosure Statement & Use of Cash Collateral Stipulation Agreement.	0.70 195.00/hr	136.50
9/15/2014	RVG Loan Servicing Reviewed, discussed & concurred with legal counsel (C. Hopkin) at length re: 3 AM LLC's Motion to Dismiss Case for Bad Faith Filing/Emergency Motion to Dismiss Case & Motion to Use Cash Collateral.	1.40 195.00/hr	273.00
9/16/2014	RVG Loan Servicing Followed up phone call from legal counsel (C. Hopkin) & discussed at length re: 3 AM LLC's Motion Order to Dismiss Debtor's Bankruptcy/Use of Cash Collateral Stipulation.	0.60 195.00/hr	117.00
9/17/2014	RVG Loan Servicing Received, reviewed and forwarded Foreclosure Auctioneer's invoice to Kristen J. re: 3 AM LLC's Foreclosure Sale Postponements.	0.40 195.00/hr	78.00
9/18/2014	RVG Loan Servicing Telephone conference with legal counsel (C. Hopkin) & A. Cooper (Foreclosure/Auctioneer) re: 3 AM LLC's Foreclosure Sale Postponement; Met with Kristen J. re: 3 AM LLC's Adequate Protection Payment application of initial payment per Cash Collateral Stipulation Agreement.	0.80 195.00/hr	156.00
9/25/2014	RVG Loan Servicing Telephone conference with legal counsel (C. Hopkin), M. Williams (Receiver/Management) & D. Wilson (Trustee) & discussed at length re: 3 AM LLC's Receivership/Management of Hotel, Motion To Dismiss Debtor's Bankruptcy & Foreclosure Sale re-publishing	0.80 195.00/hr	156.00
9/26/2014	RVG Loan Servicing Spoke, discussed, orchestrate strategies as Custodian of Records Witness with legal counsel (C. Hopkin) at length re: 3 AM LLC's Motion to Dismiss Chapter 11 Bankruptcy/Cancellation of Foreclosure Sale; Received, reviewed & discussed with legal counsel (C. Hopkin) re: 3 AM LLC's Profit/Loss & Income Statements/Feasibility & Viability of the Business Re-organization.	1.40 195.00/hr	273.00
9/29/2014	RVG Loan Servicing Conferred & discussed as Custodian of Records witness with legal counsel (C. Hopkin) re: 3 AM LLC's Motion to Dismiss Bankruptcy	0.60 195.00/hr	117.00

Thomas Seaman, Receiver for SBC

Page 9

		<u>Hrs/Rate</u>	<u>Amount</u>
	Order.		
9/30/2014	RVG Loan Servicing Telephone conference with legal counsel (C. Hopkin) & R. Gilman (Borrower's Atty) re: 3 AM LLC's Upcoming Motion to Dismiss Bankruptcy/Appoint Receiver; Responded to G. Patel's (borrower) email re: Sunshine Hospitalities' Pre-Payment Penalty Waiver by SBA/Investor.	0.70 195.00/hr	136.50
9/10/2014	TAS Loan Servicing Review collections.	0.40 375.00/hr	150.00
9/16/2014	TAS Loan Servicing Review late fee collection report.	0.30 375.00/hr	112.50
9/3/2014	TM Loan Servicing Email to agent for Sanchez re getting correct certs with corrected address of Mortgagee.	0.10 175.00/hr	17.50
	TM Loan Servicing Email to agent for Autospa re upcoming expiration.	0.10 175.00/hr	17.50
	TM Loan Servicing Received cancellation notice on Aung San. Email to borrower re need for payment. Calls to borrower, email to broker seeking invoice.	0.40 175.00/hr	70.00
9/4/2014	TM Loan Servicing Received email with invoice for Aung San re upcoming premium payment. Stored similar documents in doc files.	0.10 175.00/hr	17.50
9/5/2014	TM Loan Servicing Email from Aung San re confirmation of payment. Email to agent to confirm.	0.10 175.00/hr	17.50
	TM Loan Servicing Call to agent for Auto Spa and told the policy is on auto-renew and we will receive certs soon. Re-sent request to agent with additional email addresses. Told to call Mallory on Tuesday if certs do not come immediately.	0.10 175.00/hr	17.50
9/8/2014	TM Loan Servicing Checked spreadsheet for upcoming expirations of insurances.	0.20 175.00/hr	35.00
9/12/2014	TM Loan Servicing Received cancellation recission. Filed.	0.10 175.00/hr	17.50
	TM Loan Servicing Received Evidence of Property Insurance for Nishikigoi. Filed in doc files and edits to spreadsheet.	0.20 175.00/hr	35.00

Thomas Seaman, Receiver for SBC

Page 10

			<u>Hrs/Rate</u>	<u>Amount</u>
9/15/2014	TM	Loan Servicing Email to agent for change of name of Mortgagee for Pham.	0.30 175.00/hr	52.50
	TM	Loan Servicing Received renewal docs for insurance for San Clemente hotel.	0.10 175.00/hr	17.50
9/17/2014	TM	Loan Servicing Call to agent for DN Motels re need for renewed certs. Gave email address, received, checked against spreadsheet and made several edits.	0.40 175.00/hr	70.00
	TM	Loan Servicing Review of insurance issues for 4 loans.	0.10 175.00/hr	17.50
9/18/2014	TM	Loan Servicing Email to Rafael re Ferchoff issues.	0.10 175.00/hr	17.50
	TM	Loan Servicing Sent email requesting correct mortgagee address re JV Mattress BPP insurance.	0.10 175.00/hr	17.50
9/22/2014	TM	Loan Servicing Email to broker for Pham re need for edits to insured names.	0.10 175.00/hr	17.50
	TM	Loan Servicing Discussed with Rafael status of insurance on loans.	0.10 175.00/hr	17.50
	TM	Loan Servicing Email to brokers for Power Brake Exchange, Inc. re insurance renewal.	0.20 175.00/hr	35.00
9/23/2014	TM	Loan Servicing Email from broker for Power Brake re renewal, replied re same. Email from broker re policy being shopped.	0.10 175.00/hr	17.50
9/25/2014	TM	Loan Servicing Email to broker for Trillicom re renewal certs.	0.20 175.00/hr	35.00
	TM	Loan Servicing Email to broker for Auto Spa re renewal certs. Received email back.	0.10 175.00/hr	17.50
9/26/2014	TM	Loan Servicing Received email from Auto Spa insurer with Declarations and reviewed against spreadsheet, noticed incorrect address of Mortgagee. Made edits to pdf sent by broker, sent to broker in email.	0.30 175.00/hr	52.50
	TM	Loan Servicing Updates to spreadsheet of insurance, filed new certs.	0.20 175.00/hr	35.00

Thomas Seaman, Receiver for SBC

Page 11

		<u>Hrs/Rate</u>	<u>Amount</u>
9/29/2014	TM Loan Servicing Received email from insurance agent re Trillicom insurance. Searched doc file to find items, made pdf and copy. Replied to agent re same.	0.30 175.00/hr	52.50
	TM Loan Servicing Received Notice of Cancellation re Pham re BPP insurance. Made pdf of notice and email to agent re same.	0.20 175.00/hr	35.00
	TM Loan Servicing Filed items in doc files. Calls to agents re upcoming expirations.	0.40 175.00/hr	70.00
9/30/2014	TM Loan Servicing Email from agent from Trillicom re status of payments. Printed and put in doc file. Edits to spreadsheet.	0.10 175.00/hr	17.50
	TM Loan Servicing Call to agent for Auto Spa re need for certs.	0.10 175.00/hr	17.50
	TM Loan Servicing Called and LM with agent for Pham re need for certs. Call from and requested certs. Explanation of loss of BPP insurance in November.	0.20 175.00/hr	35.00
	TM Loan Servicing Review of certs, filed some into doc files.	0.20 175.00/hr	35.00
SUBTOTAL:		[123.00	17,059.50]
For professional services rendered		123.00	\$17,059.50
Balance due			<u>\$17,059.50</u>

PROOF OF SERVICE

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and am not a party to this action. My business address is 501 West Broadway, 15th Floor, San Diego, California 92101-3541.

On October 21, 2014, I served the within document(s) described as:

➤ **RECEIVER'S ADMINISTRATIVE MOTION FOR PAYMENT OF LOAN
SERVICING COSTS FOR SEPTEMBER 2014**

on the interested parties in this action by:

☐ **BY MAIL:** I placed a true and correct copy of the document in a sealed envelope or package addressed as indicated below on the above mentioned date in San Diego, California for collection and mailing pursuant to the firm's ordinary business practice. I am familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY OVERNIGHT DELIVERY:** I deposited in a box or other facility regularly maintained by an overnight courier service, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelopes or packages designated by the express service carrier, addressed as indicated in the attached service list on the above-mentioned date, with fees for overnight delivery paid or provided for.

Mark Feathers
1520 Grant Road
Los Altos, California 94024

Pro Se Defendant

Tel: (650) 776-2496
Fax: (650) 961-2382
Email: markfeathers@sbcglobal.net

☐ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a true copy of the document to be sent to the persons at the corresponding electronic address as indicated herein on the above-mentioned date.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 21, 2014, at San Diego, California.

Ted Fates
(Type or print name)

/s/ Ted Fates
(Signature of Declarant)